

4/9/07

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

Counsel for Specially Appearing  
Defendant Experienced Internet.com,  
Inc.

Specially appearing defendant Experienced Internet.com, Inc. ("EIC") hereby requests leave to file a memorandum up to 35 pages in opposition to Plaintiff's motion for a preliminary injunction. This will save the Court and parties time. EIC's counsel is cooperating with counsel for Stallion.com FSC, Limited; Manic Media, Inc.; DNR; Fiesta Catering International Inc., Mr. Damian Cross and Cyber Flow Solutions, Inc. to provide the Court with one opposition brief, with short joinders filed by the others.

However, the 20-page limit (Local Rule 7.1(f)) is not enough to cover all of the defendants' defenses to the preliminary injunction request, which include the Court's lack of jurisdiction over the defendants; procedural and substantive defenses to the relief sought, and numerous separate and independent grounds establishing Plaintiff's lack of likelihood of success on the merits. If the parties separate the arguments into separate briefs and each join in the others, no party will exceed the 20-page limit. However, if the Court permits, one main opposition brief will be filed (with short joinders by the others) if leave to file a brief not to exceed 35 pages is granted.

Respectfully submitted,

/s/ Richard M. Kerger

RICHARD M. KERGER (0015864)  
Counsel for Specially Appearing Defendant  
Experienced Internet.com, Inc.

/s/ Dana Milmeister

Dana Milmeister (*pro hac vice*)  
Counsel for Specially Appearing Defendant  
Experienced Internet.com, Inc.